

MADEP'S OPPOSITION EXHIBIT A

Summary Table 1**Pre-Petition Costs at Issue in MADEP's Claims¹**

	Pre-Petition Costs Being Sought in Claims	Reduction Being Sought by Debtors	Amount that Should be Allowed as General Unsecured Claim
Former Zonolite Plant Site	\$42,293.39	\$0.00	\$42,293.39
W.R. Grace Plant Acton Superfund Site	\$709,642.04	\$693,397.43	\$709,642.04
Wells G&H Aberjona River Valley Site	\$17,337.25	\$15,880.08	\$17,337.25
Blackburn & Union Privileges Site	\$5,980.96	\$0.00	\$5,980.96
MMR Pipeline Site	\$24,165.20	\$24,165.20	\$24,165.20
Totals	\$799,418.84	\$733,442.71	\$799,418.84

¹Claim #12848 and Claim #12849 each assert all of these claims against W.R. Grace & Co. and W.R. Grace & Co.-Conn., respectively. Claim #13487 asserts only claims regarding the MMR Pipeline Site against Grace Energy Corporation.

Summary Table 2

**Post-Petition Costs Already Owing
and
Potential Post-Petition Costs to be Due Annually**

	Post-Petition Costs Already Owing	Amount of Fees Due Annually Until Remediation Is Completed¹	Amounts Debtors Allege are Pre- Petition General Unsecured Claims
Former Zonolite Plant Site	\$1,863.21 ²		\$1,863.21
Daramic Plant	\$0.00 ³	\$2,600/yr	\$5,200.00
W.R. Grace Plant Acton Superfund Site	\$31,361.26		\$0.00
Cambridge Site	\$3,900.00	\$1,950/yr	\$3,900.00
Wells G&H Aberjona River Valley Site	\$6,450.62		\$0.00
Parcel 2322 Knox Trail	\$0.00	\$1,950/yr	\$1,950.00
MMR Pipeline Site	\$8,543.33	up to \$10,000/yr	\$0.00
Totals	\$52,118.42	up to \$16,500/yr	\$12,913.21

¹At the time the MADEP filed the Claims, these were the amounts of the applicable Annual Compliance Assurance Fees as identified by the Claims. By regulatory amendment, however, these amounts have changed, and, new rates will apply for all billable years ending on or after June 27, 2003, in the following amounts: \$4,000/yr for the Daramic Plant and \$3,000/yr for the Cambridge and Parcel 2322 Sites.

²Debtors object to \$1,300 in relation to the Former Zonolite Plant Site, the origin of which is unclear. *See* Debtors' Exh. E and Claims ¶ 2.a (not mentioning \$1,300 in relation to this Site).

³Debtors object to \$1,300 in relation to the Daramic Plant Site, the origin of which is unclear. *See* Debtors' Exh. F and Claims ¶ 2.b. (not mentioning \$1,300 in relation to this Site)

Summary Table 3**Potential Future Post-Petition Costs**

	Estimates of Potential Post-Petition Costs Protectively Identified in Claims	Amount to Which Debtor Objects as Not Being a Pre-Petition Unsecured Claim
Former Zonolite Plant Site	\$150,000.	\$150,000.
Daramic Plant Site	\$125,000.	\$125,000.
W.R. Grace Plant Acton Superfund Site	\$25,000,000.	\$25,000,000.
Wells G&H Aberjona River Valley Site	\$12,000,000.	\$12,000,000.
Blackburn & Union Privileges Site	\$4,000,000.	\$4,000,000.
Totals	\$41,275,000.	\$41,275,000.